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Cc: Tulis, Dana[Tulis.Dana@epa.gov]
From: Lynch, Mary-Kay
Sent: Fri 1/17/2014 10:19:28 PM
Subject: - reporter wants to know -- is it true that an EPA SPCC plan was supposed to be in place and wasn't, was a plane in place, did

There are some tanks with a glycerin mix that would be subject as an oil. These were not the tanks that had the release. There should be a plan for the glycerin tanks that were covered and we were told the OSC was going to get this plan.

EPA inspect, etc.

CWA 311: Facility inspected in 1999, when the facility was a bulk oil storage facility owned/operated by Pennzoil, subject to both SPCC and FRP regulations. There are no records of formal enforcement actions taken with the exception of SPCC Plan inconsistencies that were corrected by the facility. Upon sale of the facility in 2001, bulk storage of petroleum based products ceased. Freedom Industries, Inc., a chemical distributor, currently operates the facility. We would note that our understanding is the facility currently stores crude glycerin which is comprised of up to 10% animal fat, vegetable oil or biodiesel. Therefore the crude glycerin is an oil subject to the SPCC regulations and the tank capacity is of such a volume that the tank or tanks storing crude glycerin would be regulated under the SPCC regulations. It is our further understanding that the tank or tanks that did discharge did not contain the crude glycerin and are not subject to the SPCC regulations. If new information comes to light this initial assessment may change. The On Scene Coordinator has been directed to contact the company to obtain a copy of any SPCC plan

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